

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DONQUARION LEWIS; KE'AUJANAA  
SHEPHERD-FRIDAY; and K.B., by and  
through her parent and next friend, H.B.,

Plaintiffs,

v

MICHIGAN DEPARTMENT OF EDUCATION,  
a governmental agency,

Defendant.

Case No. 22-cv-00838-RJJ-PJG

HON. ROBERT J. JONKER

MAG. PHILLIP J. GREEN

**INDEX OF EXHIBITS**

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### INDEX OF EXHIBITS

<b>Exhibit</b>	<b>Document</b>	<b>Document date (if applicable)</b>	<b>Shortened Reference Title</b>
A	Declaration of Rebecca McIntyre	February 6, 2025	McIntyre Decl.
B	Multidisciplinary Team Evaluation of Donquarion Lewis	April 17, 2012	Multidisciplinary Evaluation 4/17/12
C	IEP Team Report for Donquarion Lewis	April 17, 2012	Lewis IEP 4/17/12
D	Review of Existing Evaluation Data and Evaluation Plan for Donquarion Lewis	January 23, 2018	REED and Evaluation Plan 1/23/18
E	Multidisciplinary Team Evaluation of Donquarion Lewis	February 10, 2015	Multidisciplinary Evaluation 2/10/15
F	IEP Team Report for Donquarion Lewis	June 9, 2021	Lewis IEP 6/9/21
G	Review of Existing Evaluation Data and Evaluation Plan for Donquarion Lewis	September 28, 2020	REED and Evaluation Plan 9/28/20
H	Deposition Transcript of Donquarion Lewis	March 5, 2024	Lewis Dep.
I	IEP Team Report for Donquarion Lewis	October 12, 2020	Lewis IEP 10/12/20
J	Letters to Donquarion Lewis regarding required credits to graduate	April 15, 2021 January 4, 2021	KPS Graduation Requirement Letters
K	Email to Donquarion Lewis regarding completion of graduation requirements and credit audit form	June 3, 2021	Graduation Email and Audit 6/3/21
L	Request for State Complaint Investigation against KPS	January 25, 2021	Lewis State Complaint 1/25/21

M	MDE's Complaint Decision - 21-0004	March 23, 2021	Complaint Decision 21-0004
N	Due Process Complaint filed by Donquarion Lewis	October 22, 2021	Lewis Due Process Complaint 10/22/21
O	Due Process Decision and Order denying Donquarion Lewis's Complaint	October 13, 2022	Lewis Due Process Decision and Order 10/13/22
P	Settlement Agreement between Donquarion Lewis and KPS	March 26, 2024	Lewis Settlement Agreement
Q	Initial Section 504 Plan for Ke'aujanaa Shepherd-Friday	May 5, 2017	Section 504 Plan 5/5/17
R	MDE's Complaint Decision and Plan for Corrective Action - 19-0213	April 18, 2020	Complaint Decision 19-0213
S	Review Section 504 Plan for Ke'aujanaa Shepherd-Friday	June 6, 2018	Section 504 Plan 6/6/18
T	Review Section 504 Plan for Ke'aujanaa Shepherd-Friday	March 15, 2019	Section 504 Plan 3/15/19
U	Request for State Complaint Investigation against KPS	October 3, 2019	Shepherd-Friday State Complaint 10/3/19
V	Section 504 – Manifestation Determination Review for Ke'aujanaa Shepherd-Friday	January 29, 2018	Manifestation Determination
W	Deposition Transcript of Ke'aujanaa Shepherd-Friday	March 26, 2024	Shepherd-Friday Dep.
X	Eligibility for Special Education Recommendation for Ke'aujanaa Shepherd-Friday	February 27, 2020	Eligibility Recommendation 2/27/20
Y	Online Registration Summary for Comstock Public Schools	September 18, 2019	CPS Registration
Z	Application for homebound services for Ke'aujanaa Shepherd-Friday	January 2020	Homebound Application

AA	Psychoeducational Evaluation Report for Ke'aujanaa Shepherd-Friday	February 20, 2020	Psychoeducational Evaluation Report
AB	CPS COVID-19 Individual Learning Plan for Ke'aujanaa Shepherd-Friday	April 20, 2020	CPS COVID-19 Learning Plan
AC	IEP Team Report for Ke'aujanaa Shepherd-Friday	September 24, 2020	Shepherd-Friday IEP 9/24/20
AD	Closeout of Findings of Noncompliance for 19-0213	February 26, 2021	CAP Closeout 19-0213
AE	Request for State Complaint Investigation against CPS	January 25, 2021	Shepherd-Friday State Complaint 1/25/21
AF	MDE's Complaint Decision and Plan for Corrective Action – 21-0005	March 26, 2021	Complaint Decision 21-0005
AG	CAP Status History showing verification and closeout of CAP for 21-0005	February 28, 2023	CAP Status History 21-0005
AH	Due Process Complaint filed by Ke'aujanaa Shepherd-Friday	February 18, 2022	Shepherd-Friday Due Process Complaint 2/18/22
AI	Settlement Agreement between Ke'aujanaa Shepherd-Friday and CPS	June 2022	Shepherd-Friday Settlement Agreement.
AJ	MDE's Complaint Decision and Plan for Corrective Action – 19-0188	November 8, 2019	Complaint Decision 19-0188
AK	Eligibility for Special Education Recommendation for K.B.	January 16, 2018	Eligibility Recommendation 1/16/18
AL	Letter of Suspension for K.B.	May 14, 2019	Suspension Letter 5/14/19
AM	Letter of Suspension for K.B.	June 27, 2019	Suspension Letter 6/27/19
AN	Kalamazoo CMHSA Services Assessment of K.B.	January 15, 2019	KCMHSA Services Assessment
AO	Deposition Transcript of K.B.	August 27, 2024	K.B. Dep.

AP	MDE's Complaint Decision and Plan for Corrective Action – 21-0007	March 23, 2021	Complaint Decision 21-0007
AQ	Request for State Complaint Investigation against KPS	September 8, 2019	K.B. State Complaint 9/8/19
AR	Multidisciplinary Team Evaluation of K.B.	October 23, 2019	Multidisciplinary Evaluation 10/23/19
AS	Notice of Ineligibility for Special Education Programs and Services for K.B.	January 18, 2019	Notice of Ineligibility
AT	Student-level CAP history showing verification and closeout of CAP 19-0188	February 10, 2020	SLCAP Status History 19-0188
AU	Closeout of Findings of Noncompliance for 19-0188	October 26, 2020	Cap Closeout 19-0188
AV	Request for State Complaint Investigation against KRESA	January 25, 2021	K.B. State Complaint 1/25/21
AW	Review of Existing Evaluation Data and Evaluation Plan for K.B.	April 12, 2021	REED and Evaluation Plan 4/12/21
AX	Physician's Verification of Physical, Mental or Health Impairment of K.B.	May 17, 2021	Physician's Verification
AY	Multidisciplinary Evaluation Team Report for K.B.	May 26, 2021	Multidisciplinary Evaluation 5/26/21
AZ	IEP Team Report for K.B.	May 26, 2021	K.B. IEP 5/26/21
BA	Letter regarding the closure of complaint 21-0007	February 2, 2022	Complaint Closure Letter 21-0007
BB	Due Process Complaint filed by H.B., on behalf of K.B.	February 11, 2022	K.B. Due Process Complaint 2/11/22
BC	Settlement Agreement between H.B., on behalf of K.B. and KPS	August 10, 2022	K.B. Settlement Agreement
BD	Deposition Transcript of Jessica Brady	July 16, 2024	Brady Dep.

BE	Deposition Transcript of Rebecca McIntyre	July 15, 2024	McIntyre Dep.
BF	MDE Dispute Resolution Program Review conducted by Pingora Consulting, LLC	February 2021	Dispute Resolution Program Review
BG	OSEP Differentiated Monitoring and Support Report	June 26, 2020	OSEP DMS Report (2020)
BH	Student-level CAP showing attempted completion of evaluation of K.B.		Catamaran SLCAP 19-0188